

TO: Mail Stop 8 Director of the U.S. Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450	REPORT ON THE FILING OR DETERMINATION OF AN ACTION REGARDING A PATENT OR TRADEMARK
---	---

In Compliance with 35 U.S.C. § 290 and/or 15 U.S.C. § 1116 you are hereby advised that a court action has been
 filed in the U.S. District Court Connecticut on the following ☒ Patents or ☐ Trademarks:

DOCKET NO. 3:08cv618 (RNC)	DATE FILED 4/25/2008	U.S. DISTRICT COURT Connecticut at Hartford
PLAINTIFF Protegrity Corporation		DEFENDANT Ingrian Networks, Inc.
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
1 6,321,201		See Attached Complaint.
2 6,963,980		
3 7,325,129		
4		
5		

In the above—entitled case, the following patent(s)/ trademark(s) have been included:

DATE INCLUDED	INCLUDED BY <input type="checkbox"/> Amendment <input type="checkbox"/> Answer <input type="checkbox"/> Cross Bill <input type="checkbox"/> Other Pleading	
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
1		
2		
3		
4		
5		

In the above—entitled case, the following decision has been rendered or judgement issued:

DECISION/JUDGEMENT

CLERK ROBERTA D. TABORA	(BY) DEPUTY CLERK <i>Kathleen Tanna</i>	DATE 4/29/08
----------------------------	--	-----------------

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

PROTEGRITY CORPORATION)	
)	
)	
Plaintiff,)	
)	Civil Action No.
v.)	
)	
INGRIAN NETWORKS, INC.)	
)	
)	
Defendant.)	JURY TRIAL DEMAND
)	

COMPLAINT AND JURY DEMAND

Plaintiff, PROTEGRITY CORPORATION, by and through its undersigned attorneys,
alleges, upon information and belief, as follows:

THE PARTIES

1. Plaintiff, Protegrity Corporation, is a corporation incorporated under the laws of the country of The Cayman Islands, with its principal operating subsidiary in the United States, Protegrity USA, Inc., a Delaware Corporation, having its principal place of business at One Canterbury Green, 201 Broad Street, Stamford, Connecticut 06901.

2. Upon information and belief, Defendant, Ingrian Networks, Inc., is a corporation incorporated under the laws of the State of California, having its principal place of business in the State of California and having an office at 350 Convention Way, Redwood City, California 94063-1405.

3. This action has arisen under the patent laws of the United States, Title 35 United States Code, Section 271 *et seq.*

4. Jurisdiction of this action arises under 28 U.S.C. §1338(a). Venue is predicated under 28 U.S.C. §1391(c).

COUNT I

5. On November 20, 2001, United States Patent Number 6,321,201 (hereinafter Patent '201) entitled "Data Security System for a Database Having Multiple Encryption Levels Applicable on a Data Element Value Level" was duly and regularly issued. A copy of the aforesaid patent is attached hereto as Exhibit "A".

6. Plaintiff is the owner of Patent '201.

7. Upon information and belief, Defendant has directly or contributorily infringed or induced the infringement of the claims of Patent '201 by having made, used or sold database security systems that duly embody the invention as claimed therein; such infringement was willful and deliberate; the infringement by Defendant of said Plaintiff's Patent '201 has deprived Plaintiff of sales which it otherwise would have made and has in other respects injured Plaintiff and will cause Plaintiff added injury and loss of profits unless enjoined by this Court.

8. The Plaintiff has been damaged by the acts of infringement complained of herein.

9. The Plaintiff has no adequate remedy without the intervention of this Court.

10. This case is "exceptional" within the meaning of 35 USC § 285.

COUNT II

11. On November 8, 2005, United States Patent Number 6,963,980 (hereinafter Patent '980) entitled "Combined Hardware and Software Based Encryption of Databases" was duly and regularly issued. A copy of the aforesaid patent is attached hereto as Exhibit "B".

12. Plaintiff is the owner of Patent '980.

13. Upon information and belief, Defendant has directly or contributorily infringed or induced the infringement of the claims of Patent '980 by having made, used or sold database security systems that duly embody the invention as claimed therein; such infringement was willful and deliberate; the infringement by Defendant of said Plaintiff's Patent '980 has deprived Plaintiff of sales which it otherwise would have made and has in other respects injured Plaintiff and will cause Plaintiff added injury and loss of profits unless enjoined by this Court.

14. The Plaintiff has been damaged by the acts of infringement complained of herein.

15. The Plaintiff has no adequate remedy without the intervention of this Court.

16. This case is "exceptional" within the meaning of 35 USC § 285.

COUNT III

17. On January 29, 2008, United States Patent Number 7,325,129 (hereinafter Patent '129) entitled "Method for Altering Encryption Status in a Relational Database in a Continuous Process" was duly and regularly issued. A copy of the aforesaid patent is

attached hereto as Exhibit "C".

18. Plaintiff is the owner of Patent '129.

19. Upon information and belief, Defendant has directly or contributorily infringed or induced the infringement of the claims of Patent '129 by having made, used or sold database security systems that duly embody the invention as claimed therein; such infringement was willful and deliberate; the infringement by Defendant of said Plaintiff's Patent '129 has deprived Plaintiff of sales which it otherwise would have made and has in other respects injured Plaintiff and will cause Plaintiff added injury and loss of profits unless enjoined by this Court.

20. The Plaintiff has been damaged by the acts of infringement complained of herein.

21. The Plaintiff has no adequate remedy without the intervention of this Court.

22. This case is "exceptional" within the meaning of 35 USC § 285.

WHEREFORE, Plaintiff prays that:

A. An injunction be granted preliminarily and permanently restraining Defendant and all those in privity with it from further infringement of Plaintiff's Patents '201, '980 and '129.

B. Defendant be required to account to Plaintiff for the damages recoverable by Plaintiff under 35 U.S.C. §284 as a result of the wrongful making, using, and selling of Plaintiff's inventions as claimed in Plaintiff's Patents '201, '980 and '129, the exact extent of which cannot now be determined by Plaintiff, and that all of such damages be trebled.

- C. Plaintiff be awarded reasonable attorney fees;
- D. Plaintiff be allowed its costs; and
- E. Such other and further relief be granted to which Plaintiff may be justly entitled.

JURY DEMAND

Plaintiff demands a trial by jury.

Respectfully submitted,

April 24, 2008



Stephen P. McNamara, ct01220
ST. ONGE STEWARD JOHNSTON & REENS LLC
986 Bedford Street
Stamford, Connecticut 06905-5619
Telephone: (203) 324-6155
Facsimile: (203) 327-1096
Email: smcnamara@ssjr.com
litigation@ssjr.com

Stefan V. Stein
Florida Bar Number 300527
Trial Counsel
HOLLAND & KNIGHT LLP
Suite 4100
100 N. Tampa Street
Post Office Box 1288
Tampa, Florida 33601-1288
Telephone: 813/227-8500
Facsimile: 813/229-0134
stefan.stein@hklaw.com

ATTORNEYS FOR PLAINTIFF